

1 OFFICE OF THE GENERAL COUNSEL
2 SEMPRA ENERGY
3 Kimberly A. McDonnell (CSB No. 156976)
4 101 Ash Street, Suite 1100
5 San Diego, CA 92101-3017
6 Telephone (619) 696-4380
7 Facsimile (619) 696-4838

8 Attorneys for Defendants SEMPRA ENERGY
9 and SEMPRA LNG

10
11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**
13

14 SAIGUT S.A. de C.V., a Mexican corporation;
15 and SAIPEM S.A., a French corporation,

16 Plaintiffs,

17 v.

18 SEMPRA ENERGY, a California corporation;
19 SEMPRA LNG, a Delaware corporation;
20 ENERGIA COSTA AZUL, S. de R.L., de C.V., a
21 Mexican corporation; BVT LNG COSTA AZUL,
22 S. de R.L. de C.V., a Mexican corporation;
23 COSTA AZUL BMVT, S.A. de C.V., a Mexican
24 corporation; BLACK & VEATCH
25 CORPORATION, a Delaware corporation;
26 TECHINT S.A. de C.V., a Mexican corporation;
27 THE KLEINFELDER GROUP, INC., a
28 California corporation; ARUP NORTH
AMERICA LIMITED, a United Kingdom
corporation; ARUP TEXAS, INC., a Texas
corporation; WHESOE OIL & GAS LIMITED,
a United Kingdom corporation; Q&S
ENGINEERING, INC., a California corporation;
and DOES 1 through 20, inclusive,

Defendants.

Case No: 08 CV 0478 JM BLM

**JOINT MOTION TO EXTEND THE TIME FOR
DEFENDANTS SEMPRA ENERGY AND
SEMPRA LNG TO RESPOND TO THE
COMPLAINT**

Judge: Jeffrey T. Miller

1 Defendants Sempra Energy and Sempra LNG hereby submit this Joint Motion to extend the
2 time in which Defendants must respond to the complaint an additional 30 days and 24 days,
3 respectively, to May 8, 2008. This Joint Motion is made with reference to the following facts:

- 4 • On March 14, 2008, Plaintiffs filed a 50 page complaint, comprising 155 paragraphs
5 of allegations and 12 causes of action, and naming 11 defendants, in addition to
6 Sempra Energy and Sempra LNG, from three different countries.
- 7 • Sempra Energy was personally served on March 19, 2008 by delivery to its
8 headquarters and its agent for service of process; it received personal delivery of the
9 complaint again on March 25. Sempra Energy's response was thus due April 8, 2008.
- 10 • Sempra LNG was served by delivery on its agent for service of process on March 25,
11 2008, making its response due April 14, 2008.
- 12 • Good cause exists for an extension of time because Defendants need time to
13 investigate adequately the claim alleged in this matter, as well as all potential defenses
14 and/or counterclaims to those claims.
- 15 • Defendants have not sought or received any other extensions of time.
- 16 • Plaintiffs do not oppose and have agreed to Defendants' request that they have to and
17 including May 8, 2008 to answer or otherwise respond to the Complaint.

18 NOW THEREFORE, these moving parties respectfully request that this Court approve and
19 enter an order in this matter as follows:

20 That defendants Sempra Energy and Sempra LNG are granted an additional 30 and 24 days,
21 respectively, within which to respond to the Complaint, such responses being now due May 8,
22 2008.

23 WHEREFORE, these moving parties respectfully request that the Court approve this Joint
24 Motion and issue the proposed order which has been sent electronically to the Court's chambers.

25 DATED: April 1, 2008

OFFICE OF THE GENERAL COUNSEL

26 By: /s/ Kimberly A. McDonnell
27 KIMBERLY A. MCDONNELL

28 Attorneys for Defendants
SEMPRA ENERGY and SEMPRA LNG